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November 1, 2013

Via Overnight Delivery

Enrique Manzanilla, Superfund Division Director
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RE: Hewlett-Packard (620-640 Page Mill Road) (EPA ID: CAD980884209)
Site, 395 Page Mill Road, 601 California Avenue and California-Olive-
Emerson (COE) Study Area

Dear Director Manzanilla:

On behalf of Hewlett-Packard Company and Varian Medical Systems, Inc., we express our sincere appreciation to you and your team for the very productive meeting on Wednesday, October 30. HP and Varian are committed to partnering with the Region in moving forward to complete an appropriate vapor intrusion evaluation in Palo Alto. The meeting allowed us to reiterate that commitment, as well as an opportunity to talk through our concern that the study proceed in a way that provides as much clarity and certainty to the community as possible, given the intrusive nature of the testing and the admittedly complex science at issue. We heard from you and your staff a corresponding desire and commitment to get this right, and we appreciate the explanations your team provided for the changes proposed.

As you heard, the companies have been and remain ready to move forward to incorporate into our vapor intrusion study in Palo Alto short-term actions levels that EPA determines are appropriate. Nonetheless, we remain concerned about applying such a dramatic change in approach without formal guidance from EPA and particularly with some of the other proposed changes that we fear will add uncertainty and believe are not consistent with the data collected in our study in Palo Alto. In this regard we note, as we noted in the discussion Wednesday, that groundwater contaminants have not been detected in any of the breathing space samples that have been collected in the 20 buildings tested to date.

It was great to hear your team's confidence that guidance on the short-term action levels from Washington will be issued by the end of the calendar year. We

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realized in our own discussion after the meeting that knowing that the guidance is coming this year, and its likely content, may provide a basis for a possible path forward that we believe could meet both the Region's and the companies' objectives. Your team's willingness to consider proceeding on a step-wise basis, that takes into account the testing and results that we have in hand at this time (and additional data we gather in Palo Alto as we move forward), will help in developing a plan to move forward quickly. We took to heart your commitment to additional testing in January and your advice that we should not wait for the resolution and issuance of a letter to develop an addendum to the work plan. Therefore, in lieu of providing detailed comments on the draft letter at this time, we have asked Mark Becker and Stantec to start immediately on an addendum to our existing work plan to include residential testing in January, assuming access and an approved work plan addendum by that time. We believe that we can develop an addendum now that will meet the primary objectives of the Region that we took from our meeting and address our concerns about insuring as much certainty in the process as possible. Our goal is to provide that work plan addendum shortly, with the hope that this removes the urgency of determining the form and content of a Water Board letter.

We also appreciate your willingness to convene again to confirm that we are on a path that moves this study constructively forward. We were encouraged by the Region's commitment to hear and consider our concerns, and we pledge to work hard to craft a proposal to meet the Region's and the companies' goals.

Respectfully submitted,

HEWLETT-PACKARD Company



Paul E. Paschke
Environmental Program Manager

VARIAN MEDICAL SYSTEMS,
INC.



Alan Palter
Director, Environmental Affairs

cc:

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